

Template for comments - Draft ISPMs for country consultation, 2005

**DRAFT ISPM: REQUIREMENTS FOR THE SUBMISSION OF PHYTOSANITARY TREATMENTS**

Please use this table for sending country comments to the IPPC Secretariat ([ippc@fao.org](mailto:ippc@fao.org)). See instructions on how to use this template at the end of the table. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee

**Please make sure that the cell "country name" is filled for each row of comments**

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
<b>GENERAL COMMENTS</b>	USA	Technical			Any reference to need for testing different varieties of a commodity should clearly state that such testing is required only when there is a technical justification for such a requirement. Otherwise requirements for varietal testing could be regarded as unjustified barriers to trade.  References for use of treatments internationally should be removed (e.g. Outline of requirements; Section 1.2; section 2.1; section 2.6 1 <sup>st</sup> , 3 <sup>rd</sup> and 4 <sup>th</sup> dash points; etc.). If the treatment is useful, it may be used by a few, but not all countries. "internationally useful" and "global" application should not be a requirement.
<b>SPECIFIC COMMENTS</b>					
<b>TITLE OF THE DRAFT</b>					
<b>INTRODUCTION</b>					
SCOPE					
REFERENCES					
DEFINITIONS					
OUTLINE OF REQUIREMENTS					
<b>BACKGROUND</b>					
<b>REQUIREMENTS</b>					
<b>1. Criteria for Treatments</b>					

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
1.1 General requirements	USA	Technical			It should clearly state that BOTH efficacy data from laboratory experiments AND efficacy data under practical conditions are required (not one or the other).
		Technical	1 <sup>st</sup> dash point	Add: .....rendering pests infertile/incapable of further development .....	This term is needed in the case of irradiation treatment
<i>1.1.1 Efficacy data from laboratory or controlled experiments</i>					
<i>1.1.2 Efficacy data on the target pest(s) under practical conditions</i>					
1.2 Feasibility and applicability	USA	Technical / editorial		Delete first sentence of first paragraph. The rest should say “Factors that may affect the feasibility include human health and safety, commodity quality and environmental impact. Treatment schedules ...”	Suggest “Feasibility” and “Applicability” be addressed separately –make section 1.2 “Feasibility”. Feasibility would address issues such as cost, availability of materials, etc. Make a new section 1.3 to address applicability; address that specific pest/commodity pairs for which treatments may be proposed should be addressed.
<b>2. Requirements for Submission of a Proposal for a Phytosanitary Treatment</b>					
2.1 General considerations	USA	Editorial		Delete both paragraphs	neither paragraph provides information that is not already addressed elsewhere in the standard.
2.2 Summary information and contact details					
2.3 Description of the phytosanitary treatment	USA	Editorial Technical		Delete the parentheses but keep the text.	Items in parentheses are all essential in the description of the treatment. Technical comment: suggest that blueprints or photos of equipment may also be used in the description of the phytosanitary treatment.
2.4 Treatment targets	USA	Technical	Dash points	Propose to add a dash point stating that the configuration(s) of proposed commodities	The configuration(s) of commodities can affect the efficacy of the treatment.

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				should also be considered (e.g. see ISPM No. 18 regarding the use of irradiation as a phytosanitary treatment and dose mapping).	
2.5 Efficacy data in support of the submission					
2.5.1 <i>Efficacy data on the target pest(s) under laboratory or controlled experiments</i>	USA	Technical	Fourth para / dash points	3 <sup>rd</sup> point: delete “(where varietal differences...for all varieties under consideration)”	Not technically justified.
		Editorial	Last para, first dash point	Delete “tolerant” and insert “resistant”	More correct term
2.5.2 <i>Efficacy data on the target pest(s) under practical conditions</i>	USA	Technical	Third para	Add “Where the treatment specifications differ in practical trials, <b><i>details of the protocol should be provided</i></b> ”.	Suggested rewording.
		Technical	Fourth para	Add : “estimated infestation levels of the target pest”	Pre-treatment infestation levels will have a bearing on the efficacy of the treatment.
2.6 Information on technical and commercial feasibility	USA	Editorial	Section title	Amend to read “Information on technical and commercial feasibility and applicability”	Consistent with wording elsewhere.
		Technical	Dash points	Add a dash point for applicability of treatment with respect to specific commodity / pest combinations.	It is not clear what the point would include.
		Technical	Last dash point	e.g to the environment, to non-target organisms	
<b>3. Evaluation of Submissions</b>					
<b>Appendix 1</b> Cover page for a submission of a phytosanitary treatment					
<b>Appendix 2</b> Operational procedures for prioritizing and evaluating submitted information on phytosanitary treatments [title]					
<b>Appendix 2 - 1. Priorities</b>					

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
Appendix 2 - 2. Evaluations of submissions					
Appendix 2 - 3. Outcome of evaluation					

## **INSTRUCTIONS FOR THE USE OF THE TEMPLATE**

Tables of comments will be compiled so that all country comments on each section (or even paragraph) will appear together. The compiled tables will be transmitted to the SC (and added to the IPP).

**Please do not add or delete columns and do not change their width.**

Title of the columns and expected content:

### **1. SECTION**

- This gives the titles of sections as they appear in the draft, plus a row for general comments. If changes are proposed for titles of sections, they should be made in the column "proposed rewording".
- **There should be no empty cell in this column**
- General comments apply to the entirety of the standard. Specific comments apply to a defined section of the draft, which should be clearly identified.
- If several comments are made on several paragraphs of a same section, it is suggested that one or several row(s) should be added. The titles of the section should be repeated in the new rows
- If there is no comment on one section, the other cells in the row should be left empty or the entire row should be deleted.

### **2. COUNTRY**

- To facilitate compilation of comments, the country name should be indicated in every row for which a comment is being made
- **There should be no empty cell in this column.**

### **3. TYPE OF COMMENTS**

For each comment on specific sections of the text, governments are requested to clearly indicate if the comment is considered to refer to:

- a technical/substantive issue with the content of the standard.
- an editorial issue
- a translation issue.

#### **Technical/substantive issue**

These are the comments which suggest changes to the meaning of the standard, if the concepts expressed or the technical content is wrong in the view of the country commenting. They cover conceptual problems, scientific errors, technical adjustments etc. Rewording should be proposed and detailed explanations should be given to facilitate understanding and review by the Standards Committee.

#### **Editorial issue**

The ideas expressed are thought to be correct, but the wording could be improved (spelling, vocabulary used, grammar or structure of the sentence) to clarify or simplify the text. **The meaning must not be changed.** Examples:

- A term appears in the text and is thought to be needed in the definitions section of the standard.
- A sentence needs to be changed to make it consistent with wording used elsewhere in the text.
- A clearer word which does not change the meaning could be used.
- The language used could be simplified

Note: Any change, although minor, which might change the meaning of the text is not editorial and should be classified as technical.

#### **Translation issue**

This is limited to points for which the English version is thought to be correct, but appears wrongly translated in the French or Spanish versions. Examples:

- A term of the Glossary used in the English has not been given its proper Glossary equivalent in the language concerned
- A technical term has not been translated with its proper technical equivalent in the plant protection framework
- A quote from another document should have been taken directly from the document concerned but has been retranslated.

4. LOCATION

The place where the comment applies in the section concerned should be clearly identified. It should refer to the text as circulated for country comments. To facilitate compilation of countries tables, it is suggested that governments refer to titles, paragraphs, sentences, indents with a standard wording to be used as indicated in the table below. Do not use "page" or "line" as these may vary depending on the word processor used. Examples:

Comment regarding	Wording to be used	Further specification of location
Title of the section	Title	
Rewording of the second paragraph of the section	Para 2	
Rewording of the fourth sentence of the 3rd paragraph of the section	Para 3, sentence 4	
Rewording of the 6th indent of paragraph 4	Para 4, indent 6	
Addition of a new indent after indent 2 in paragraph 7	Para 7, indent 2	Add after indent 2: ....
Addition of a new indent after the last of a list	Para 7, last indent	Add last indent
Addition of a new paragraph after paragraph 4	Para 4	Add new paragraph after para 4: ....

5- PROPOSED REWORDING

- Rewording should always be proposed for any changes thought necessary to the text. As relevant, modifications to the current text should appear as revision marks (i.e. text which is added or deleted should appear in a distinct way from unchanged text, for example text added can be underlined and delete text can be ~~struck through~~, as suggested on the example below.
- Suggestions for new paragraphs/indents should be clearly identified as such ("add....").

6- EXPLANATION

This field should always be completed and should include the justification for the comment made. Such explanations are essentials and should be sufficient for the Standard Committee to understand the comment and the proposed rewording.

EXAMPLE OF A COUNTRY'S COMMENTS AS REVISION MARKS IN THE TEMPLATE

1-Title	2-country	3- Type of comment	4. Location	5. Proposed rewording	6. Explanation
General comments	Name	-	-	The use of NPPO and contracting parties need to be considered throughout the document and made consistent with the IPPC.	
4.1.2 Measures for imported consignments	Name	editorial	Title	<u>Requirements for imported consignments</u>	Aligns with section 4, 4 <sup>th</sup> bullet
4.1.2 Measures for imported consignments	Name	1- editorial 2- technical  (or in two rows if more suitable)	Para 1	The regulations should specify the <u>requirements (phytosanitary measures)</u> with which imported consignments of plants, plant products and other regulated articles should comply. These measures may be general, applying to all types of commodities, or specific, applying to <u>specified</u> commodities from a particular origin. <u>Measures</u> may be required prior to entry, at entry or post entry. Systems approaches may also be used when appropriate.	1- Align with section 4 and modified heading 2- The commodity also should be specified.
4.1.2 Measures for imported consignments	Name	editorial	Para 3, indent 1	documentary <u>checks</u>	clarification
4.1.2 Measures for imported consignments	Name	technical	Para 3, last indent	Add: phytosanitary inspection.	another appropriate option

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